



EXD Engineering and Land Surveying, Inc.

February 5, 2008

Aaron Setran
Ground Water Office
U.S. Environmental Protection Agency Region IX
75 Hawthorne Street (WTR-9)
San Francisco, CA 94105

Re: Response to the Compliance Requirements Section 3 of the PTP Inc. Consent Agreement and Proposed Final Order Docket No. UIC-09-2007-0002

Dear Aaron,

This letter is to present a recommendation for PTP compliance with the above-referenced document. Section 3 of this order reads as follows:

“Pursuant to EPA’s authority under Section 1423(c) of the SDWA, 42 U.S.C. § 300h-2(c), Respondent shall submit a Plan, including schedules, to EPA for approval within thirty (30) days of the effective date of the Final Order in this matter, which specifies how and when Respondent will comply with **Parts II.E.3 and II.G.1(a) and (b)** of the subject Permit, related to annual inspections, monitoring and reporting associated with the Facilities”

Part II.E.3 of the original, and current, PTP permit outlines the following requirements.

3. Perform Annual Maintenance Inspection

- a. Each injection line shall be inspected and evaluated annually by a registered engineer. The engineer’s inspection shall include, at a minimum, the following:
 - i. inspect the entire collection system, removing manhole covers to observe the condition of the piping and lift stations (including pumps) and noting any signs of inflow or excess infiltration;
 - ii. inspect the evenness of distribution through the distribution boxes and make required adjustments;
 - iii. evaluate the condition of the advanced treatment units and dosing siphons;
 - iv. check the depth of ponding in all in-field observation wells;
 - v. check the disposal well area for excess vegetative growth;
 - vi. note any repairs or additional maintenance required to be performed on the sewage collection, treatment and dispersal system.

- b. The Permittees shall complete all repairs noted in the inspection report required under **Part II.G.1.b** within forty-five (45) days of receiving the report.

Part II.G.1(a) and (b) of the original, and current, PTP permit outlines the following requirements.

G. REPORTING

1. Reporting Frequency

Appendix C consists of a summary table of requirements for Maintenance/Inspections, Monitoring/Sampling, and Reporting.

- a. The following reports must be submitted to EPA **monthly**:
 - i. A record of all maintenance activity outlined in the Maintenance Plan required by Part II.E.1 (page 9);
 - ii. A clear, specific report of the sampling activities and results outlined in Parts II.F.2.a and II.F.2.b (page 11), following the Sampling Plan required by Part II.F.1.a (page 10);
 - iii. A clear, specific report of the sampling activities and results outlined in Parts II.F.3.a (page 11) and II.F.4 (page 11), following the Sampling Plan required by Part II.F.1.a (page 10);
- b. The following reports must be submitted to EPA **annually**:
 - i. A report detailing the results of the comprehensive Annual Maintenance Inspection requirements required by Part II.E.3 (page 10).

The proposed plan for meeting the plan and reporting requirements is presented here. The registered engineer on the project will perform the following inspections:

- Inspect the collection system at least once per year. The inspections will be prepared on an inspection log and photos of each manhole will be taken. Any deficiencies will be reported to PTP. The collection system report will be included in the monthly report, during which the inspection was made, and the annual report. Inspect the pumps and lift stations. The maintenance personnel inspect the pumps and lift stations on a weekly basis. The engineer shall inspect the pumping systems at least four times per year.
- Every distribution box is to be inspected by the engineer at least once per year. An inspection form shall be completed and submitted with the annual report. Any issues are to be reported to PTP and the engineer is to verify the repairs were made and were adequate.
- The engineer is to inspect the condition of the advanced treatment units and dosing siphons at least four times per year. The maintenance personnel inspect these on a weekly basis. The engineer will respond to issues which require attention in a timely manner.
- The engineer will check the depth of ponding of every observation well during the year. Each observation well shall be in use at the time of the engineers inspection.

- The engineer shall inspect the disposal field for excessive vegetation. The engineer will report the condition to PTP to remove the vegetation. This will be recorded in the monthly report and the annual report.
- The engineer will report any issues which require attention to PTP and note the request and the resolution on the monthly and annual reports. Any maintenance will be recorded on the monthly and annual reports.
- Any repair/maintenance requests shall be dated as to when the problem/issue was discovered and when the report was given to PTP. The issues are to be resolved within forty-five (45) days.
- The engineer will read and summarize the Monitoring/Sampling reports and the Maintenance/Inspections reports for the monthly reports. The EPA will provide the criteria for a sampling violation to the engineer and concur with the engineers understanding. Any violations in the samples can then be noted and reported to PTP by the engineer.